

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

v.

TRAVIS C. BROWN,

Defendant.

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Criminal No. 2:16cr81

STATEMENT OF FACTS

By signing below, the parties stipulate that the allegations in Criminal Information and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt.

1. From at least on or about March 16 to March 19, 2016, in Norfolk and Virginia Beach and elsewhere, in the Eastern District of Virginia and elsewhere, in and affecting interstate commerce, the defendant TRAVIS C. BROWN, also known as "Savo," knowingly did combine, conspire, confederate and agree with other persons to recruit, entice, harbor, transport, provide, obtain, and maintain Jane Doe, a girl who was 16 years old, knowing and in reckless disregard of the fact that Jane Doe was under the age of 18 years and that Jane Doe would be caused to engaged in a commercial sex act and, and after having had a reasonable opportunity to observe Jane Doe, in violation of Title 18, United States Code, Sections 1594, 1591(a)(1), (b)(2), and (c).

2. On or about March 16, 2016, BROWN was introduced to Jane Doe at a residence in Newport News, Virginia, by a co-conspirator known as "Tweezy." BROWN drove Jane Doe,

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“Tweezy,” and others to a hotel in Virginia Beach, Virginia, where he (BROWN) rented two rooms for the group’s use.

3. Shortly after arriving at the hotel, Jane Doe told BROWN and others that she was sixteen years old. On the afternoon and evening of March 16, 2016, the group stayed in one room of this Virginia Beach hotel and had a party during which Jane Doe was provided with alcohol, marijuana, and the drug “molly.” During this timeframe, two adult females within the group took prostitution appointments in the other room BROWN had rented at the hotel.

4. Jane Doe stayed in a hotel room with BROWN and/or one of his co-conspirators on the night of March 16 and March 17, 2016.

5. On March 18, 2016, BROWN and a co-conspirator drove Jane Doe to a retail clothing store where BROWN purchased lingerie for Jane Doe. The group then traveled to a different hotel in Virginia Beach, where BROWN again rented two rooms. Once inside, BROWN and his co-conspirator told Jane Doe to dress in the newly purchased lingerie and took pictures of Jane Doe on a cell phone. During this photo session, BROWN and his co-conspirator draped a door in one of the hotel rooms with a white cover and directed Jane Doe on how to pose for the pictures in front of this backdrop.

6. Later that day, Jane Doe began prostituting for BROWN and his co-conspirator from the hotel room. The co-conspirators posted advertisements for Jane Doe’s services on the Internet, and posted the pictures they had taken of her. BROWN and his co-conspirator arranged appointments for Jane Doe to engage in commercial sex acts, set the prices Jane Doe was to collect from the customers, and stayed in contact with Jane Doe by cell phone call or text message at the beginning and end of each appointment. At the conclusion of each appointment, Jane Doe provided the money she had earned to BROWN.

7. BROWN and his co-conspirator provided Jane Doe with condoms for use during her commercial sex acts, which condoms were manufactured in states other than the Commonwealth of Virginia and which were in and affected interstate commerce.

8. Customers were directed to various hotel rooms to meet with Jane Doe. BROWN rented these hotel rooms using prostitution proceeds, accepted guests who traveled in interstate commerce and the use of these hotels involved and affected interstate commerce.

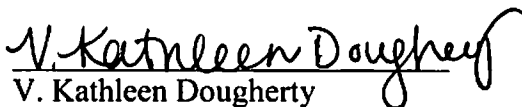
9. In total, Jane Doe engaged in approximately three prostitution appointments at the direction of BROWN and his co-conspirator, after which time she was recovered by detectives from the Virginia Beach Police Department.

10. Virginia Beach, Virginia, is within the Eastern District of Virginia.

11. The acts taken by the defendant, TRAVIS C. BROWN, in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law and were not committed by mistake, accident, or other innocent reason. The defendant acknowledges that the foregoing Statement of Facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not describe all of the defendant's conduct relating to the offense charged in this case, does not identify all of the persons with whom the defendant may have engaged in

illegal activities, and is not intended to be a full enumeration of all the facts surrounding the defendant's case.


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Defendant's Signature: After consulting with my attorney and pursuant to the plea agreement entered into this day between myself, the United States and my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.


TRAVIS C. BROWN
Defendant

Defense Counsel's Signature: I am the attorney for defendant TRAVIS C. BROWN. I have carefully reviewed the above Statement of Facts with him. To the best of my knowledge, his decision to stipulate to these facts is an informed and voluntary one.


Kirsten R. Kmet
Counsel for Defendant